

From: Paul Cantrell
To: Microsoft ATR
Date: 1/28/02 1:43pm
Subject: Microsoft Settlement

I am strongly opposed to the proposed final judgment of the Microsoft anti-trust case. It is weak, and unlikely to have any substantive effect on Microsoft's conduct.

The PFJ places far too much trust in Microsoft's willingness to follow the spirit as well as the letter of the settlement. When the PFJ says in section III.J.1, for example, that Microsoft is required to share certain technical details, except when those details would harm security -- as determined by Microsoft itself! -- it nullifies any real power the settlement has to force Microsoft to share the details the company most wants to hide.

General opinion in the software world is that obfuscation is the enemy of security. A system is only secure if everyone knows how it works, and agrees it can't be broken. As a software engineer, it is unclear to me how hiding any API, protocol, or documentation would protect or enhance the security of any conceivable "anti-piracy, anti-virus, software licensing, digital rights management, encryption or authentication systems". It is eminently clear to me, however, how Microsoft could cite unspecified "security reasons" to cripple execution of the judgment. Section III.J.1 is a loophole, and only a loophole. So why is it present in the PFJ?

The judgment is rife with similar problems.

Microsoft must not be able to "outsmart" any judgment in this case. The current settlement fails that test miserably.

Thank you for this opportunity for public comment.

Paul Cantrell
Software Engineer
St. Paul, Minnesota